EMIR REGULATORY REPORTING

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ICE Link offers all market participants a no-work regulatory reporting compliance solution in accordance with rules established under Article 9 of the European Market Infrastructure Regulation (EMIR) and technical standards imposed by the European Securities and Markets Authority (ESMA). The solution leverages all existing ICE Link CDS workflows allowing customers to comply with regulatory reporting obligations to a Trade Repository (TR) with minimal to no effort.

The EMIR regulatory reporting functionality is further simplified with available automatic enrichment of static reference data, incorporated Unique Trade Identifier (UTI) communication and generation logic per ISDA guidelines, automatic determination of which trades and or allocations are reportable, and reports are automatically communicated to Trade Repositories in real-time upon affirmation of the ICE Link workflow.

ADVANTAGES OF ICE LINK EMIR REGULATORY REPORTING

- **Satisfies EMIR reporting requirements using existing ICE Link CDS workflow trade details**
- **Automatic reporting enrichment of static data provides no-work solution for ICE Link clients**
- **Eliminates need to self-develop complex Trade Identifier (UTI) generation logic per ISDA guidelines**
- **Configurations automatically determine which trades and allocations are reportable**
- **Provides real-time connectivity to Trade Repositories eliminating need for complex integrations**
- **ICE Link already reports bilateral trade confirmations for almost all clients to the Trade Warehouse**
- **Removes extremely difficult task of tracking various data sources and Trade Repositories for each lifecycle workflow**

ICE LINK UNIQUELY POSITIONED FOR EMIR REGULATORY REPORTING

Cleared or Bilateral	Reportable Events	Event Initiator	Event Available in ICE Link	UTI Generation	UTI Communication	ICE Link TR Submission	Supported TR
Bilateral	NEW TRADE-UNALLOCATED BLOCK	Dealer	Y	Dealer/ICE Link	ICE Link	Y	DTCC Europe
	NEW TRADE-ALLOCATION	Client	Y	ICE Link	ICE Link	Y	DTCC Europe
	NOVATION	Client	Y	ICE Link	ICE Link	Y	DTCC Europe
	TERMINATION	Client	Y	Dealer/ICE Link	ICE Link	Y	DTCC Europe
	SEF	SEF	Y	SEF	ICE Link	Y	DTCC Europe
	AMENDMENT	Dealer	Y	Dealer/ICE Link	ICE Link	Y	DTCC Europe
	CREDIT & SUCCESSION EVENT	TIW	Y	N/A	ICE Link	Y	DTCC Europe
ICE Cleared	NEW TRADE-UNALLOCATED BLOCK	Dealer	Y	Dealer/ICE Link	ICE Link	Y	TV Europe
	CLEARED TRADE (BETA/GAMMA)	CCP	Y	CCP	ICE Link	Y	TV Europe
	SEF	SEF	Y	SEF	ICE Link	Y	TV Europe
	DAILY MTM & COLLATERAL VALUATION	CCP	Y	CCP	ICE Link	Y	TV Europe
	NETTING	CCP	Y	CCP	ICE Link	Y	TV Europe
	TRANSFER	CCP	Y	CCP	ICE Link	Y	TV Europe
	CREDIT & SUCCESSION EVENT	CCP	Y	CCP	ICE Link	Y	TV Europe

KEY EMIR REGULATORY REPORTING REQUIREMENTS AND DATA ATTRIBUTES

KEY ESMA REGULATORY REPORTING REQUIREMENTS

ESMA Reporting Attribute	Description
All Trade Counterparties Must Report & Reporting Delegation	• All parties to the trade, including CCPs, are independently responsible for reporting derivative trade details to the Trade Repository (per Article 9 of EMIR) • Trade parties may delegate their reporting responsiblities to middleware firms like ICE Link and to Clearing Houses or Exchanges like ICE Clear Credit or ICE Clear Europe • This requirement differs from US CFTC reporting where one trade party is responsible to report
T + 1 End of Day Deadline	• Per timely reporting requirements (Article 12), trades must be reported to a Trade Repository by the end of next day of the trade date • ICE Link permits users to report pending trades in advance of confirmation if pending as of the end of T+1 • Financial Counterparties are required (Article 1c) to notify their local regulator of the count of non-confirmed transactions exceeding 5 business days
Common Trade Identifier	• All parties to the trade must agree to and report a common trade identifier (referred to as the Unique Trade Indentifier, • ICE Link provides criticial UTI creation logic, calculating which party generates the UTI based on jurisdiction, if dual jurisdiction, clearing, and SEF
Registration of Legal Entities	• All reporting parties are required to register their legal entities with a compliant Legal Entity Identifier (LEI) issuer of which is used to identify legal entities in trade reporting
Daily MTM & Collateral Valuation	• All reporting parties are required to report their daily valuation and portfolio collateral amounts; for cleared trades this is the clearing house reported values

Please see ESMA rules and technical standards for details http://www.esma.europa.eu/content/Draft-technical-standards-under-Regulation-EU-No-6482012-European-Parliament-and-Council-4-J

Aside of the trade economics, regulatory reporting submissions will include data attributes specific to the ESMA requirements such as Unique Trade Identifiers (UTI), ESMA Product Identifiers (Taxonomy), and Legal Entity Identifiers (LEIs). ICE Link can default these data attributes based on existing transaction details and static reference data information.

KEY ESMA REGULATORY REPORTING DATA ATTRIBUTES

ESMA Data Attribute	Description
Unique Trade Identifier (UTI)	• Unique reference submitted to the TR • Must be a common value between both Buyer and Seller, communicated and agreed in ICE Link • Includes a prefix derived from the counterparty Legal Entity Identifier (7-16 characters) or namespace
ESMA Taxonomy & Asset Class	• The ESMA defined contract type identifier • Asset Class category defined by ESMA
Financial or Non-Financial Counterparty	• Indicates if the trade counterparty is a Financal Counterparty (i.e. investment firm, bank, insurer, registered UCITS or pension fund) or not
Legal Entity Identifier (LEI)	• The unique legal entity identifier registered with a regulator approved LEI system and provided when identiying a counterparty
Jurisdiction & Non-EEA Counterparty	• Indicates the party in the trade is ESMA Regulated • Indicates if counterparty entity is not under the jurisdiction of the European Economic Area
Collateral Valuation	• Value of portfolio collateral; updated daily (Article 17 techical standard)
Mark to Market Valuation	• Mark-to-Market value of the position; updated daily (Article 17 techical standard)
Clearing Threshold	• Indicator if reporting party is above or below the clearing threshold as defined in EMIR Article 10(3)
Linked to Commercial Activity or Treasury Financing	• Indicates if trade is hedging trade as per Article 10 (4)
Principal or Agent	• Indicates if the trade party is a principal holder to the trade or agent; if an agent, then the ultimate beneficiary is to be provided
Collateral Portfolio & Code	• Whether collateralisation is portfolio based • Unique code identifying the portfolio for margin purposes

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